

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

ZALEIPH WOOTEN and TAWANA PATINA
REID, Individually and as Co-Administrators
of the Estate of Z.W., Jr., a Deceased Minor,

Plaintiffs,

v.

THE BOPPY COMPANY, LLC,
WALMART INC., ARTSANA U.S.A., INC.
d/b/a CHICCO and ARTSANA S.p.A. d/b/a
ARTSANA GROUP, et al.,

Defendants.

CIVIL ACTION

NO.: 2:22-cv-04341-KSM

STIPULATION TO DISMISS PUNITIVE DAMAGES WITHOUT PREJUDICE

It is hereby stipulated and agreed, by and among counsel for Plaintiffs and counsel for Defendants Artsana U.S.A., Inc. d/b/a Chicco and The Boppy Company, LLC, as identified below, that all claims for punitive damages contained within Plaintiffs' Complaint as to Artsana U.S.A., Inc. d/b/a Chicco and The Boppy Company, LLC are hereby STRICKEN and DISMISSED. This dismissal is without prejudice to Plaintiffs' right to move for leave to amend the Complaint to reassert these claims for punitive damages after the completion of discovery.

To the extent the statute of limitations applies to a claim for punitive damages, which Plaintiffs deny, the parties agree that the statute of limitations is tolled as to punitive damages relating back to the date Plaintiffs filed their Complaint, which was October 7, 2022.

It is further agreed to and Stipulated by the parties that entering into and signing this Stipulation is not deemed or construed, in any manner, to be a waiver of jurisdiction by The Boppy Company, LLC.

This Stipulation may be executed in counterparts.

KLINE & SPECTER, P.C.

RAWLE & HENDERSON, LLP

By: /s/ Michael A. Trunk
Shanin Specter, Esquire
Michael A. Trunk, Esquire
Attorneys for Plaintiffs

By: /s/ Mary Ann Capriotti
Thomas A. Kuzmick, Esquire
Mary Ann Capriotti, Esquire
Attorneys for Defendants,
The Boppy Company, LLC &
Artsana U.S.A., Inc. d/b/a Chicco

Date: November 17, 2022

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